

## **EXHIBIT I**

## Michael Gilman

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**From:** Mike Gilman <mgilman@pgclawgroup.com>  
**Sent:** Wednesday, December 09, 2015 10:04 AM  
**To:** dbrezina@ladas.net  
**Cc:** Iciar Narvaez  
**Subject:** Peacock Feather Violation by Seventh Avenue - The Basu Group, Inc. - PGC Ref. 847-025  
**Attachments:** US CPY Reg VA 1652678 - Peacock Feather #1.pdf; Seventh Avenue - Hand Painted Leather Peacock Bag.jpg  
**Importance:** High

David,

It's been a while. I hope you are well and that you remember me. If you do not remember me, I am counsel for The Basu Group, Inc. and you and I were involved in a copyright litigation in the Southern District of New York involving your clients, Midnight Velvet, Inc. and Seventh Avenue, Inc., and their supplier at that time, Biacci Inc.

I am writing to you today, to inform you of a new allegation of copyright infringement by The Basu Group against your Seventh Avenue client. This new allegation involves one of the same copyrights our client asserted in the Biacci case, namely, US Copyright Reg. No. VA 1-652-678, entitled Peacock Feather #1. A copy of this registration is attached. The accused Seventh Avenue bag is seen on the attached image from your client's website, and is entitled "Hand-Painted Leather Peacock Bag," and appears to be item number "#D7724955".

We request the following:

- The name, address and contact information for Seventh Avenue's supplier(s) of the allegedly infringing bag;
- The total number of these allegedly infringing bags ordered by Seventh Avenue from these supplier(s), whether already delivered or pending delivery to Seventh Avenue;
- The number of these allegedly infringing bags sold by Seventh Avenue;
- The number of these allegedly infringing bags held in inventory by, or on behalf of, Seventh Avenue; and
- Copies of all purchase orders and invoices relating to these allegedly infringing bags.

I look forward to working with you to amicably resolve this matter.

Sincerely,

**Michael R. Gilman | Partner**  
**PERGAMENT & CEPEDA LLP**

**Main Contact Info.**  
163 Madison Ave., Suite 110  
Morristown, NJ 07960  
T: 973-998-7722  
F: 973-998-7720  
C: 201-522-9050

**Secondary Contact Info.**  
315 Madison Ave., Ste 901  
New York, NY 10017  
(212) 807-4171 phone  
(212) 957-1912 fax

Admitted NY & CT ONLY

[mgilman@pgclawgroup.com](mailto:mgilman@pgclawgroup.com)  
[www.pgclawgroup.com](http://www.pgclawgroup.com)

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number:

VA 1-652-678

Effective date of  
registration:

February 10, 2009

Title \_\_\_\_\_

Title of Work: Peacock Feather #1

Completion/ Publication \_\_\_\_\_

Year of Completion: 2007

Date of 1st Publication: January 1, 2008

Nation of 1st Publication: United States

Author \_\_\_\_\_

■ Author: The Basu Group Inc.

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: United States

■ Author: Societe Maison De Cuir

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: India

■ Author: Soumitra Roy

Author Created: 2-D artwork

Work made for hire: No

Domiciled in: India

Copyright claimant \_\_\_\_\_

Copyright Claimant: The Basu Group Inc.

2227 US Highway One, #162, North Brunswick, NJ, 08902, United States

Transfer Statement: By written agreement

Rights and Permissions \_\_\_\_\_

**Organization Name:** The Basu Group Inc.

**Name:** To whom it may concern

**Address:** 2227 US Highway One

#162

North Brunswick, NJ 08902 United States

Certification

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**Name:** Michael R. Gilman

**Date:** February 6, 2009

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**Correspondence:** Yes







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**Hand-Painted Leather Peacock Bag**  
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An accessory that adds instant wow to your look, this one-of-a-kind hand-painted bag is covered front and back with a fantasy representation of peacock feathers. Three compartments, 2 side pockets and 2 interior pockets make organization easy. Two zip closure compartments, one magnetic snap compartment. Adjustable shoulder strap. 10" l x 3 1/2" w x 7" h.

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